UNITED STATES DISTRICT COURT DISTRICT OF MINNESOTA

HOWARD B. SAMUELS, solely as chapter 7 trustee of the estates of CENTRAL GROCERS, INC., STRACK AND VAN TIL SUPER MARKET, INC. and SVT, LLC,

Plaintiffs,

v.

CARGILL, INC., JBS USA FOOD COMPANY HOLDINGS, NATIONAL BEEF PACKING COMPANY, TYSON FOODS, INC.,

Defendants.

Case No. 20-cv-1319 (JRT/HB)

DEFENDANT JBS USA FOOD COMPANY HOLDINGS' RULE 7.1 DISCLOSURE STATEMENT

Pursuant to Federal Rule of Civil Procedure 7.1, the undersigned counsel of record for Defendant JBS USA Food Company Holdings ("JBS USA Holdings") hereby certifies the following:

- 1. JBS USA Holdings' parent corporation is JBS Luxembourg S.à r.l ("JBS Luxembourg"), a Luxembourg private limited liability company.
- 2. JBS USA Holdings and JBS Luxembourg are indirect wholly-owned subsidiaries of their ultimate parent JBS, S.A., a Brazilian company.
- 3. Except for JBS, S.A., which is publicly traded, there is no publicly traded corporation that owns more than 10% of JBS USA Holdings' stock.

As reflected in the agreed-upon Stipulation (Dkt. No. 20), JBS USA Holdings expressly reserves its rights to raise any and all defenses in this litigation.

Dated: August 3, 2020

SPENCER FANE LLP

By: /s/ Donald G. Heeman

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